

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh
Chapter 11

**SECOND SUPPLEMENTAL DECLARATION OF MICHAEL P. RICHMAN
UNDER BANKRUPTCY RULE 2014**

I, Michael P. Richman, hereby declare as follows:

1. I submit this Second Supplemental Declaration of Michael P. Richman Under Bankruptcy Rule 2014 (“**Second Supplemental Declaration**”) pursuant to Fed. R. Bankr. P. 2014(a), and in further support of the Notice and Application of Debtor for Authority to Retain and Employ Richman & Richman LLC as Counsel for the Debtor Effective as of April 10, 2024 (the “**Application**”) [Doc 10], of Wisconsin & Milwaukee Hotel LLC, the debtor herein (“**Debtor**” or “**WMH**”).

2. This Court entered an Order Granting Application of Debtor for Authority to Retain and Employ Richman & Richman LLC as Counsel for the Debtor Effective as of April 10, 2024 (the “**Order Approving Application**”), on May 22, 2024 [Doc 131].

3. Unless otherwise stated, the facts set forth herein are based on my personal knowledge, upon records maintained by Richman & Richman LLC (“**R&R**”) in the ordinary course of business, and which have been reviewed by me or other R&R attorneys or employees at my direction, or upon information provided to me by other

R&R attorneys or employees. To the extent any information disclosed in this declaration requires amendment or modification as additional information becomes available, an additional supplemental declaration will be submitted to the court.

4. As stated in paragraph 13 of the Application: “R&R, as part of its ordinary business practice, periodically reviews and adjusts the hourly rates it charges for professional services. These adjustments typically occur at the beginning of each calendar year.” [See Application, Doc 10]

5. In its periodic review and adjustment to its hourly rates charged for professional services, R&R considers, among other things, information available from public and private sources regarding hourly rates charged by peer firms.

6. Following a periodic review of its hourly rates, effective January 1, 2025, R&R adopted the following revised standard billing rate structure as follows:

- Michael P. Richman, Partner
Original Rate: \$750.00; Revised Rate \$795.00 per hour
- Claire Ann Richman, Partner
Original Rate: \$575.00; Revised Rate \$625.00 per hour
- Eliza M. Reyes, Associate
Original Rate: \$450.00; Revised Rate \$495.00 per hour
- James Soo, Associate
Original Rate: \$275.00; Revised Rate \$325.00 per hour
- Paralegals
Original Rate: \$195.00; Revised Rate \$225.00 - \$250.00 per hour
- Law Clerks
Original Rate: \$195.00; Revised Rate \$195.00 - \$225.00 per hour

7. The range of the billing rate increase is between \$30 and \$50 per hour.

8. The amended billing rate structure is reasonable and consistent with the hourly rates R&R charges clients in bankruptcy and non-bankruptcy matters and is consistent with hourly rates charged by peer firms in these chapter 11 cases.

9. To the extent any information disclosed herein requires amendment or modification upon R&R's completion of further review, a further supplemental declaration will be filed stating such amended or modified information.

I declare under penalty of perjury under the laws of the United States that, based upon my knowledge, information and belief as set forth in this Second Supplemental Declaration, the foregoing is true and correct to the best of my knowledge.

Executed in Madison, Wisconsin this 18th day of February, 2025.



Michael P. Richman